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June 17, 2022

BY ECF

The Honorable LaShann DeArcy Hall
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Hasbajrami*,
11 Cr. 623 (JG)

Dear Judge DeArcy Hall:

This letter is in regard to the above-entitled case, in which Michael K. Bachrach, Esq., and I represent defendant Agron Hasbajrami, and, for the reasons set forth below, respectfully requests an extension until June 24, 2022 (from June 17, 2022), for the time which Mr. Hasbajrami will file his Reply submission. I have been in contact with Assistant United States Attorney Saritha Komatireddy, and she has informed me the government does not object to this application.

The extension is requested because this past week Mr. Bachrach had to visit a client at the U.S. Administrative Maximum facility (ADX) in Florence, Colorado, and certain weather issues also interfered with his travel schedule. In addition, the lockdown last week at the Metropolitan Detention Center in Brooklyn caused me scheduling problems this week with respect to time-sensitive issues (such as responding to an expiring plea offer and finalizing two sentencing submissions) that required consultation with those clients (who were rendered unavailable last week as a result of the lockdown).

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Honorable LaShann DeArcy Hall
United States District Judge
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Page 2 of 2

Accordingly, it is respectfully requested that the time for filing of defendant's Reply be extended until June 24, 2021. As noted above, the government does not object to this application.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Joshua L. Dratel", written in a cursive style.

Joshua L. Dratel

JLD/